

BRETT A. SHUMATE
Assistant Attorney General
YAAKOV M. ROTH
Principal Deputy Assistant Attorney General
Civil Division
WILLIAM H. WEILAND
Acting Assistant Director
ANNA DICHTER
Senior Litigation Counsel
ERIC SNYDERMAN
LAUREN BRYANT
CATHERINE ROSS
AMANDA B. SAYLOR
JEFFREY M. HARTMAN
DANIEL CAPPELLETTI
SHELBY WADE
Trial Attorneys
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et al.*,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et al.*,

Defendants.

Case No. 3:25-cv-5687-TLT

**DEFENDANTS' EMERGENCY MOTION TO
SHORTEN TIME**

Judge: Hon. Trina L. Thompson

1 Defendants have filed an emergency motion to stay the Court's July 31, 2025, order postponing
2 certain actions taken by Defendant Kristi Noem, Secretary of Homeland Security. ECF No. 73. Expedited
3 briefing is necessary because the Court's order prevents the Secretary's terminations of TPS for Honduras,
4 Nepal, and Nicaragua. *See Termination of the Designation of Honduras for [TPS]*, 90 Fed. Reg. 30,089
5 (July 8, 2025) (termination effective Sept. 8, 2025); *Termination of the Designation of Nepal for [TPS]*,
6 90 Fed. Reg. 24,151 (June 6, 2025) (termination effective August 5, 2025); *Termination of the Designation*
7 *of Nicaragua for [TPS]*, 90 Fed. Reg. 30,086 (July 8, 2025) (termination effective Sept. 8, 2025).
8 Specifically, Defendants request that the Court issue a decision on Defendants' motion for a stay pending
9 appeal no later than 12:01 p.m. PDT on August 8, 2025. If the Court does not grant Defendants' motion
10 by then, Defendants intend to move for a stay pending appeal of this Court's order (ECF No. 73) with the
11 United States Court of Appeals for the Ninth Circuit. *See* Fed. R. App. P. 8(a). Plaintiffs were notified
12 of this motion by email on August 1, 2025, and did not provide a position before filing; Defendants believe
13 that Plaintiffs are opposed to this motion and intend to file a response.
14
15
16
17
18
19
20
21
22
23
24
25

1 Dated: August 1, 2025

Respectfully submitted,

2 BRETT A. SHUMATE
Assistant Attorney General

3 YAAKOV M. ROTH
4 Principal Deputy Assistant Attorney General
Civil Division

5 WILLIAM H. WEILAND
6 Acting Assistant Director

7 ANNA DICHTER
Senior Litigation Counsels

8 ERIC SNYDERMAN
9 LAUREN BRYANT
CATHERINE ROSS
10 JEFFREY M. HARTMAN
AMANDA SAYLOR
11 DANIEL CAPPELLETTI
SHELBY WADE
12 Trial Attorneys

13 /s/ Jeffrey Hartman
JEFFREY HARTMAN
14 Trial Attorney (WSBA 49810)
U.S. Department of Justice, Civil Division
15 Office of Immigration Litigation
General Litigation and Appeals Section
16 P.O. Box 868, Ben Franklin Station
Washington, DC 20044
17 Tel: (202) 532-4404
Jeffrey.M.Hartman@usdoj.gov

18 *Attorneys for the Defendants*
19
20
21
22
23
24